

## **EXHIBIT 25**

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE NORTHERN DISTRICT OF OHIO  
3           EASTERN DIVISION  
- - -

4       IN RE: NATIONAL : HON. DAN A.  
5           PRESCRIPTION OPIATE : POLSTER  
6           LITIGATION : MDL NO. 2804  
7           :  
8       This document relates to: : Case No. 17-MD-2804  
9           :  
10      The County of Summit, Ohio :  
11      Ohio et al. v. Purdue Pharma :  
12      L.P., et al., Case No. :  
13      17-OP-45004 :  
14      :  
15      The County of Cuyahoga v. :  
16      Purdue Pharma Purdue Pharma :  
17      L.P., et al., Case No. :  
18      18-OP-45090 :  
19      - - -  
20      - HIGHLY CONFIDENTIAL -  
21      SUBJECT TO FURTHER CONFIDENTIALITY REVIEW  
22

23           VOLUME I  
24           - - -  
25      May 9, 2019

26           Videotaped deposition of  
27      CRAIG J. McCANN, Ph.D., CFA, taken  
28      pursuant to notice, was held at the law  
29      offices of Morgan Lewis & Bockius, LLP,  
30      1111 Pennsylvania Avenue, NW, Washington,  
31      D.C., beginning at 10:03 a.m., on the  
32      above date, before Michelle L. Gray, a  
33      Registered Professional Reporter,  
34      Certified Shorthand Reporter, Certified  
35      Realtime Reporter, and Notary Public.

36           - - -  
37      GOLKOW LITIGATION SERVICES  
38      877.370.3377 ph | 917.591.5672 fax  
39           deps@golkow.com

1 Q. Okay. And you didn't -- you  
2 didn't apply any other criteria?

3 A. Not that I can think of.

4 Q. Okay. In that Paragraph 130  
5 that I just read out, you say at the  
6 beginning that you implemented various  
7 approaches. And is that talking about  
8 the approaches that are discussed later  
9 in that section, Approaches 1, 2, 3, 4  
10 and 5?

11 A. Yes.

12 Q. You are not talking about  
13 anything else than that?

14 A. Correct.

15 Q. And then you have five  
16 approaches in this report; is that  
17 correct?

18 A. Yes.

19 Q. And the first one is the  
20 maximum monthly trailing six-month  
21 threshold, correct?

22 A. Correct.

23 Q. And the second is the twice  
24 trailing 12-month average pharmacy dosage

1 units, correct?

2 A. Yes.

3 Q. And we can do it slower,

4 sorry, you're flipping through.

5 MR. MOUGEY: Which page are  
6 you referencing?

7 MS. McENROE: I'm just going  
8 through a list of them, but --

9 MR. MOUGEY: Right.

10 MS. McENROE: -- that's  
11 fine.

12 BY MS. McENROE:

13 Q. The third one starts on  
14 Page 64. So the third one is the three  
15 times trailing 12-month average pharmacy  
16 dosage units; is that correct?

17 A. Yes.

18 Q. The fourth one starts on  
19 Page 68, is the maximum 8,000 dosage  
20 units monthly; is that correct?

21 A. Yes.

22 Q. And the fifth one, starts on  
23 Page 72, is maximum daily dosage units.

24 Do you see that?

1 A. I do.

2 Q. So if I refer to your five  
3 approaches, will you understand that I'm  
4 referring to those five approaches as  
5 I've just read them out?

6 A. Yes.

7 Q. Did you apply any other  
8 approaches aside from those five in  
9 reaching your conclusions?

10 A. Not with respect to the  
11 conclusions I reached in Section 9 at  
12 least.

13 Q. Okay. From where did you  
14 get the five approaches that you apply in  
15 Section 9?

16 A. From discussions with  
17 counsel.

18 Q. Who? Is it the same list of  
19 people that we discussed earlier today?

20 A. Yes. There may be some  
21 additional lawyers whose names didn't  
22 come to mind when I was giving you the  
23 names of people I interacted with  
24 earlier.

1                   Q.     Okay. So just so that I can  
2     make sure that I have it all straight.  
3     So you got the five approaches from  
4     plaintiffs' counsel, and you applied them  
5     to the data, and that's it, with respect  
6     to Section 9?

7                   A.     Correct.

8                   Q.     So it's fair to say that any  
9     one of these approaches could be or could  
10   not be appropriate for use in this  
11   particular setting; you're just not  
12   taking an opinion on that one way or the  
13   other?

14                  A.     Right. I think other  
15   witnesses are going to deal with that  
16   issue.

17                  Q.     And just to make sure I'm  
18   totally clear, you're not opining  
19   anywhere that any of these approaches is  
20   or is not required by law in any way?

21                  A.     Correct.

22                  Q.     I think you mentioned  
23   earlier that there are certain  
24   assumptions that are built into your

1       a year column and there's a percent of  
2       flagged transactions column. And I see a  
3       year and a percent column in Professor  
4       Cutler's report that was put in front of  
5       me. That's the extent to which I can  
6       observe that they're similar.

7           Q.     Okay. So you didn't provide  
8       the specific numbers that are in Table  
9       J-1 of Professor Cutler's report,  
10      correct?

11          A.     Not that I'm aware of.

12               We -- I'll stop there.

13          Q.     Thank you.

14          A.     You're welcome.

15          Q.     One last quick question.

16               Earlier, just a few minutes  
17       ago, you were asked, did you do any peer  
18       grouping of any of the pharmacy buyers  
19       compared to similar pharmacies in the  
20       area, and you responded yes.

21               Is your "yes" response based  
22       solely on the fact that you did certain  
23       analyses that grouped retail chain  
24       pharmacies together?